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**PROPOSED COUNSEL TO DEBTORS AND
DEBTORS IN POSSESSION**

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:	§	Chapter 11
	§	
Higher Ground Education, Inc., <i>et al.</i> , ¹	§	Case No.: 25-80121-11 (MVL)
	§	
Debtors.	§	(Joint Administration Requested)

**AMENDED AGENDA FOR MATTERS SCHEDULED FOR
FIRST-DAY HEARING TO BE HELD ON JUNE 20, 2025, AT 9:30 A.M.**

Higher Ground Education, Inc. (“HGE”) and its affiliated debtors and debtors in possession (collectively, the “Debtors”), hereby file their amended agenda for hearing on **Friday, June 20, 2025, at 9:30 A.M. (prevailing Central Time)**, before the Honorable Michelle V. Larson, U.S. Bankruptcy Judge for the Northern District of Texas (the “Hearing”). The Debtors will ask the Court to consider the following:

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s federal identification number, are: Higher Ground Education Inc. (7265); Guidepost A LLC (8540); Prepared Montessorian LLC (6181); Terra Firma Services LLC (6999); Guidepost Birmingham LLC (2397); Guidepost Bradley Hills LLC (2058); Guidepost Branchburg LLC (0494); Guidepost Carmel LLC (4060); Guidepost FIC B LLC (8609); Guidepost FIC C LLC (1518); Guidepost Goodyear LLC (1363); Guidepost Las Colinas LLC (9767); Guidepost Leawood LLC (3453); Guidepost Muirfield Village LLC (1889); Guidepost Richardson LLC (7111); Guidepost South Riding LLC (2403); Guidepost St Robert LLC (5136); Guidepost The Woodlands LLC (6101); Guidepost Walled Lake LLC (9118); HGE FIC D LLC (6499); HGE FIC E LLC (0056); HGE FIC F LLC (8861); HGE FIC G LLC (5500); HGE FIC H LLC (8817); HGE FIC I LLC (1138); HGE FIC K LLC (8558); HGE FIC L LLC (2052); HGE FIC M LLC (8912); HGE FIC N LLC (6774); HGE FIC O LLC (4678); HGE FIC P LLC (1477); HGE FIC Q LLC (3122); HGE FIC R LLC (9661); LePort Emeryville LLC (7324); AltSchool II LLC (0403). The Debtors’ mailing address is 1321 Upland Dr. PMB 20442, Houston, Texas 77043.



A. Matters to be Heard:

1. *Debtors' Emergency Motion for Entry of an Order (I) Directing Joint Administration of Chapter 11 Cases and (II) Granting Related Relief* [Docket No. 2; Filed on 6/18/2025]

i. Related Documents:

- a. *Declaration of Jonathan McCarthy in Support of First Day Motions* [Docket No. 15];
- b. *Notice of First Day Hearing* [Docket No. 18]; and
- c. *Certificate of Service* [Docket No. 34].

ii. Response Deadline: Prior to the Hearing.

iii. Status: This matter will go forward. At this time, no objections have been filed or asserted concerning the motion or the Court's entry of the proposed order as filed.

2. *Notice of Designation as Complex Chapter 11 Bankruptcy Case* [Docket No. 3; Filed on 6/18/2025]

i. Related Documents:

- a. *Declaration of Jonathan McCarthy in Support of First Day Motions* [Docket No. 15];
- b. *Notice of First Day Hearing* [Docket No. 18]; and
- c. *Certificate of Service* [Docket No. 34].

ii. Response Deadline: Prior to the Hearing.

iii. Status: This matter will go forward.

3. *Debtors' Emergency Motion for Order Extending Time to File Schedules of Assets and Liabilities and Statements of Financial Affairs* [Docket No. 4; Filed on 6/18/2025]

i. Related Documents:

- a. *Declaration of Jonathan McCarthy in Support of First Day Motions* [Docket No. 15];
- b. *Notice of First Day Hearing* [Docket No. 18]; and
- c. *Certificate of Service* [Docket No. 34].

- ii. Response Deadline: Prior to the Hearing.
 - iii. Status: This matter will go forward.
4. ***Debtors' Emergency Motion for Entry of an Order (I) Authorizing the Debtors to Serve a Consolidated List of Creditors (II) Authorizing the Debtors to Redact Certain Personal Identification Information; (III) Approving the Form and Manner of Notifying Creditors of the Commencement of the Debtors' Chapter 11 Cases and Bar Dates; and (IV) Granting Related Relief [Docket No. 5; Filed on 6/18/2025]***
- i. Related Documents:
 - a. *Declaration of Jonathan McCarthy in Support of First Day Motions [Docket No. 15];*
 - b. *Notice of First Day Hearing [Docket No. 18]; and*
 - c. *Certificate of Service [Docket No. 34].*
 - ii. Response Deadline: Prior to the Hearing.
 - iii. Status: This matter will go forward.
5. ***Debtors' Emergency Application for Entry of an Order Authorizing the Retention and Employment of Kurtzman Carson Consultants, LLC dba Verita Global as Claims, Noticing and Solicitation Agent, Effective as of the Petition Date [Docket No. 6; Filed on 6/18/2025]***
- i. Related Documents:
 - a. *Declaration of Jonathan McCarthy in Support of First Day Motions [Docket No. 15];*
 - b. *Notice of First Day Hearing [Docket No. 18];*
 - c. *Notice of Filing of Revised Proposed Order Authorizing Debtors Application for Entry of an Order Authorizing the Retention and Employment of Kurtzman Carson Consultants, LLC dba Verita Global as Claims, Noticing and Solicitation Agent, Effective as of the Petition Date [Docket No. 32]; and*
 - d. *Certificate of Service [Docket No. 34].*
 - ii. Response Deadline: Prior to the Hearing.
 - iii. Status: This matter will go forward.

6. Debtors' Emergency Motion for Entry of an Order (I) Authorizing and Approving Procedures to Reject Executory Contracts and Unexpired Leases and (II) Granting Related Relief [Docket No. 7; Filed on 6/18/2025]

i. Related Documents:

- a. *Declaration of Jonathan McCarthy in Support of First Day Motions* [Docket No. 15];
- b. *Notice of First Day Hearing* [Docket No. 18]; and
- c. *Certificate of Service* [Docket No. 34].

ii. Response Deadline: Prior to the Hearing.

iii. Status: This matter will go forward.

7. Debtors' Emergency Motion for Entry of an Order (I) Authorizing the Debtors to (A) Continue Their Insurance Policies and Honor All Obligations in Respect Thereof, (B) Renew, Supplement, and Enter Into New Insurance Policies, and (C) Pay Premiums Thereunder, and (II) Granting Related Relief [Docket No. 8; Filed on 6/18/2025]

i. Related Documents:

- a. *Declaration of Jonathan McCarthy in Support of First Day Motions* [Docket No. 15];
- b. *Notice of First Day Hearing* [Docket No. 18]; and
- c. *Certificate of Service* [Docket No. 34].

ii. Response Deadline: Prior to the Hearing.

iii. Status: This matter will go forward.

8. Debtors' Emergency Motion for Entry of an Order (I) Authorizing the Payment of Certain Prepetition Taxes and Postpetition Taxes and (II) Granting Related Relief [Docket No. 9; Filed on 6/18/2025]

i. Related Documents:

- a. *Declaration of Jonathan McCarthy in Support of First Day Motions* [Docket No. 15];
- b. *Notice of First Day Hearing* [Docket No. 18]; and
- c. *Certificate of Service* [Docket No. 34].

ii. Response Deadline: Prior to the Hearing.

iii. Status: This matter will go forward.

9. *Debtors' Emergency Motion for Entry of an Order (I) Authorizing the Debtors to Maintain and Administer Their Existing Deposit Programs and Honor Certain Prepetition Obligations Related Thereto and (II) Granting Related Relief [Docket No. 10; Filed on 6/18/2025]*

i. Related Documents:

- a. *Declaration of Jonathan McCarthy in Support of First Day Motions [Docket No. 15];*
- b. *Notice of First Day Hearing [Docket No. 18]; and*
- c. *Certificate of Service [Docket No. 34].*

ii. Response Deadline: Prior to the Hearing.

iii. Status: This matter will go forward.

10. *Debtors' Emergency Motion for Entry of an Order (I) Authorizing Debtors to Pay Certain Prepetition Claims of Foreign Vendors and (II) Granting Related Relief [Docket No. 11; Filed on 6/18/2025]*

i. Related Documents:

- a. *Declaration of Jonathan McCarthy in Support of First Day Motions [Docket No. 15];*
- b. *Notice of First Day Hearing [Docket No. 18]; and*
- c. *Certificate of Service [Docket No. 34].*

ii. Response Deadline: Prior to the Hearing.

iii. Status: This matter will go forward.

11. *Debtors' Emergency Motion for Entry of an Order (I) Authorizing Debtors to (A) Pay Prepetition Wages, Salaries, Other Compensation, and Reimbursable Expenses, (B) Continue Employee Benefits Programs, and (II) Grant Related Relief [Docket No. 12; Filed on 6/18/2025]*

i. Related Documents:

- a. *Declaration of Jonathan McCarthy in Support of First Day Motions [Docket No. 15];*
- b. *Notice of First Day Hearing [Docket No. 18]; and*
- c. *Certificate of Service [Docket No. 34].*

- ii. Response Deadline: Prior to the Hearing.
- iii. Status: This matter will go forward.

12. Debtors' Emergency Motion for Entry of an Order (I) Authorizing Debtors to (A) Continue to Operate Their Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto, (C) Maintain Existing Business Forms, and (D) Continue Certain Intercompany Transactions, and (II) Granting Related Relief [Docket No. 13; Filed on 6/18/2025]

- i. Related Documents:
 - a. Declaration of Jonathan McCarthy in Support of First Day Motions [Docket No. 15];
 - b. Notice of First Day Hearing [Docket No. 18]; and
 - c. Certificate of Service [Docket No. 34].
- ii. Response Deadline: Prior to the Hearing.
- iii. Status: This matter will go forward.

13. Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Postpetition Senior Secured Financing from 2HR Learning, Inc.; (B) Obtain PostPetition Junior Secured Financing from Guidepost Global Education, Inc.; (C) Utilize Cash Collateral; and (D) Pay Certain Related Fees and Charges; (II) Granting Adequate Protection to the Prepetition Lender; (III) Modifying the Automatic Stay; (IV) Scheduling a Final Hearing; and (V) Granting Related Relief [Docket No. 14; Filed on 6/18/2025]

- i. Related Documents:
 - a. Declaration of Jonathan McCarthy in Support of First Day Motions [Docket No. 15];
 - b. Notice of First Day Hearing [Docket No. 18];
 - c. Notice of Filing of Revised Proposed Interim Order (I) Authorizing the Debtors to (A) Obtain Postpetition Financing Senior Secured Financing from YYYYY, LLC; (B) Obtain Postpetition Junior Secured Financing from Guidepost Global Education, Inc.; (C) Utilize Cash Collateral; and (D) Pay Certain Related Fees and Charges; (II) Granting Adequate Protection to the Prepetition Lender; (III) Modifying the Automatic Stay; (IV) Scheduling a Final Hearing; and (V) Granting Related Relief [Docket No. 33]; and
 - d. Certificate of Service [Docket No. 34].
- ii. Response Deadline: Prior to the Hearing.

iii. Status: This matter will go forward.

B. Witness and Exhibits Lists:

1. *Debtors' Witness and Exhibit List for First Day Hearing* [Docket No. 22].

DATED: June 19, 2025

Respectfully submitted by:

/s/ Holland N. O'Neil

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**PROPOSED COUNSEL TO DEBTORS
AND DEBTORS IN POSSESSION**

CERTIFICATE OF SERVICE

I hereby certify that on June 19, 2025, a true and correct copy of the foregoing document was served electronically by the Court's PACER system.

/s/ Nora J. McGuffey
Nora J. McGuffey